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DOCKET NO. 95-116; RM 8535

June 13, 1996

JUN 13 1996

EX PARTE

BY HAND

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Telephone Number Portability
CC Docket No. 95-116; RM 8535

Dear Mr. Caton:

On June 12, 1996, Jennifer Johns, CCTA's consultant, and I met with Daniel Gonzalez, Senior Legal Advisor to Commissioner Chong, and Kasia Biernacki, a Legal Intern for Commissioner Chong, to discuss issues relating to Number Portability including the need for a solution that does not discriminate between ported and non-porting numbers by a date certain.

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, two copies of the written documents distributed are attached for inclusion in the public record in the above-captioned proceedings.

Should you have any questions regarding this matter, please contact me.

Sincerely,

Jeffrey Sinsheimer

cc: Daniel Gonzalez
Kasia Biernacki

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

JUN 13 1996

MCI Telecommunications Corporation)	
(U 5001 C),)	
Complainant,)	
)	
vs.)	C.96-03-039
)	C.96-03-040
Pacific Bell,)	
Defendant.)	

REPLY COMMENTS OF
THE CALIFORNIA TELECOMMUNICATIONS COALITION IN RESPONSE TO
ADMINISTRATIVE LAW JUDGE'S RULING SETTING FORTH THE SCOPE AND
SCHEDULE OF THIS PROCEEDING

The California Telecommunications Coalition ("Coalition")¹ hereby submits its reply to the respective May 24 Comments of GTE California Incorporated (GTE) and Pacific Bell (collectively referred to as "incumbents") regarding the 415 and 916 area code relief alternatives. Those Comments urge the Commission to adopt overlay plans for the 415 and 916 NPAs. In justifying their position, however, both Pacific Bell and GTE require that the Commission accept as fact several fictions. Those fictions include assertions that local telephone competition currently exists in the 415 and 916 NPAs, that statutory requirements can be met only with an

¹ The members of the Coalition joining in these comments are: AT&T Communications of California, Inc.; California Association of Long Distance Telephone Companies; California Cable Television Association; ICG Access Services, Inc.; MCI Telecommunications Corporation; Sprint Communications Co., L.P.; and Teleport Communications Group.

overlay, that permanent number portability will soon be available, and that an overlay is better for the consumer than a geographic split. As discussed below, those fictions are insufficient criticism of the proposed split models and are inadequate justification for adopting an overlay plan for the 415 and 916 NPAs.

Fiction #1: Competition Is “Robust” In the 415 and 916 NPA

A. A List Of Potential Competitors Is Not Evidence That Competition Is Underway

In Decision 95-08-052 (the “310 Decision”), the Commission found that Pacific Bell’s proposed overlay plan for the 310 area code was anti-competitive, particularly in light of the fact that local competition only recently was allowed to begin and that it would take some time for competition to “mature.”² Pacific Bell and GTE now attempt to escape a similar finding in this proceeding by proclaiming competition is “robust”³ and that the 415 and 916 NPAs are “hot bed[s] of local competition.”⁴ The Commission must recognize that the incumbent claim is absurd.

Neither Pacific Bell nor GTE provide any credible evidence that local competition is underway in the 916 or 415 NPAs. GTE is particularly loose in its claims: “Local exchange competition is very strong in the greater Sacramento area from both statewide competitors like

² D.95-08-052, mimeo at 46-47.

³ Pacific Bell Comments at 2.

⁴ Comments of GTE at 3.

AT&T Communications of California, Inc. (AT&T) and other more geographically focused CLCs such as Brooks Fiber of Sacramento and Pac-West Telecomm, Inc.”⁵ However, AT&T has *no* local presence in Sacramento or anywhere else in California t this time. Such distortions and exaggerations are rife in GTE’s Comments. In addition, at this time no cable operator listed by the incumbents provide local service. Some of the existing “competition” listed by Pacific Bell do not even have interconnection agreements with an incumbent. The Commission must reject the notion that a mere list of potential competitors is evidence of the existence of competition.

B. CLC NXX Codes In the Old NPA Is Not Evidence Of Competition

Pacific Bell claims that since CLCs have recently obtained some NXX codes in the 415 NPA, concerns about the anti-competitive effect of an overlay do not apply.⁶ Again, this fact does not evidence the existence of competition.. The Commission must recognize that possessing NXX codes is not the same as having customers. It is the customer, not the NXX code, that counts in assessing whether competition exists. The incumbents provide no evidence that CLCs have customers. Furthermore, the incumbent CLC NXX code information does not even provide an indication concerning the extent of potential competition, as the CLC NXX codes may simply reflect the presence of two or three CLCs, hardly an indicator of “robust” competition..

In any event, the number of NXX codes held by CLCs is a far cry from being significant enough to suggest that the playing field with an overlay is level. The 14 NXX codes held by CLCs in the 916 NPA mean that incumbents control almost 98 percent of the telephone

⁵ GTE Comments at 2.

⁶ Pacific Bell Comments at 3.

numbers in the 916 NPA. The 53 NXX codes in 415 means that incumbents control over 90 percent of the telephone numbers in the highly prized 415 NPA. Incumbent clamoring for an overlay to preserve such an advantage is not surprising.

C. Resellers Are Not Indifferent To the Choice Between An Overlay And A Split

Pacific Bell tells the Commission that resellers have targeted the San Francisco region, and that resellers, who have the same access to NXX codes as the incumbent Local Exchange Company, are indifferent to an overlay because they get their numbers from the incumbent.⁷ However, any companies who enter the market as resellers who intend eventually to build out their own facilities and become real competitors are not indifferent to an overlay because its anti-competitive effects are amplified over time. When all of the NXX codes in an area code have been assigned, the incumbent will be the sole source for numbers in the old area code. Resellers cannot be indifferent if they ever intend to slough off their dependence upon the wholesale provider. Indeed, an overlay would discourage resellers from developing their own facilities because they would be blocked from access to the numbering resources warehoused by the incumbent.

Fiction #2: Number Portability Solves Competitive Shortcomings Of A 415/916 Overlay

Pacific Bell claims that the use of an overlay will not have an anti-competitive effect since customers may now keep their number using Interim Number Portability and “in the

⁷ Pacific Bell Comments at 4.

near future” Permanent Number Portability. To the contrary the Coalition believes neither form of number portability mitigates entirely the anti-competitive effects of an overlay in the 415 and 916 NPAs. First, Permanent Number Portability will not be available “in the near future”⁸ as Pacific Bell says. In fact, while Pacific Bell tells the Commission Permanent Number Portability “will soon be available,” it tells the industry something very different. Pacific Bell advised vendors and other industry members present at the May 31 California Local Number Portability Task Force meeting that Pacific Bell “won’t be writing checks” to vendors until cost recovery issues are settled. In response to Pacific Bell’s repeated statement, a representative from a potential vendor responded that while it is now doing development work on number portability software, it must stop its development schedule if the market does not step up.⁹ Pacific Bell will not likely step up any time soon. The cost recovery issues Pacific Bell has posed regarding number portability will likely be contentious and will certainly require hearings to resolve, another delay in deployment at odds with Pacific Bell’s assurances in its area code pleadings.

Compounding the factors that delay the implementation of Permanent Number Portability in California is Lucent’s recent representation to the Number Portability Task Force that the earliest availability for QoR software and generic release dates would be 18 months from the time final requirements and business arrangements are completed with interested customers.¹⁰ Since the 415 area code is now expected to exhaust in late 1997, it seems clear that Permanent

⁸ Pacific Bell Comments at 3.

⁹ See attached Declaration of Jerome F. Candelaria

¹⁰ See Attachment A, Letter from Lucent Technologies to Task Force Chair dated May 20, 1996.

Number Portability will not be available by the 415 exhaust date as Pacific Bell contends.

As to Interim Number Portability, the Commission has already advised parties that it is not inclined to consider the interim measure an adequate substitute for permanent number portability since the temporary measure increases the risk of premature exhaustion of NXX codes due to the required double assignment of numbers. Moreover, since interim line number portability represents a premium customers must pay for an alternative provider or an extra expense a CLC must pay for a customer, it magnifies the anti-competitiveness of arrangements provided at the sufferance of the incumbent LECs. In addition, interim number portability achieved through Remote Call Forwarding degrades service, rendering impossible the delivery of certain custom call services to CLC customers. The Commission cannot rely upon Interim LNP to mitigate the ant-competitive effects of an overlay, and Permanent LNP will simply not be available to rely upon, thanks to Pacific Bell.

Fiction #3: Pacific Bell Is Precluded From Implementing A Split Due To Statutory Notice Requirements

Pacific and GTE argue that since 24-month notice was given in December of 1995, relief cannot be implemented before December 1997 per the notice requirements contained in Public Utilities Code Section 7931 and Section 7930(a). Therefore, the incumbents contend, only the use of an overlay plan will prevent violations of the statutory requirements. The incumbents' purely superficial reading of the relief notice statutes uses the letter of the law to punish the spirit in an attempt to use a statute on relief notice to justify permitting exhaust to occur before relief will be provided.

Pacific Bell's perverse construction is all the more remarkable when one considers that the timing crisis is virtually of Pacific Bell's making. Members of the Coalition have previously complained that 415 planning was conducted dangerously late in the exhaust process, and that Pacific Bell alone, who was in possession of the information about the accelerating exhaust, should have convened relief planning much sooner.¹¹ The Commission should not reward Pacific Bell's allocation of resources to area code issues, (if that was the problem), by accepting its perverse timing argument. The mismanagement of scheduling relief planning could result in exhaust, but the appropriate response to that situation would be to begin planning for equitable distribution of the remaining resources, not to accept an overlay plan based solely on Pacific Bell's conjured technicality. Instead, the Commission should adhere to its conclusion in the 310 Decision that the statutory provisions of Code Sections 7930-7931 "do not legally foreclose the Commission from ordering its own implementation of a geographic split if the Commission finds that it is in the public interest to do so"¹²

If Pacific Bell can implement relief before exhaust, it should do so. Pacific Bell should not be allowed to construe a statute on exhaust notice so as to create an exhaust crisis.

Fiction #4: Customers Will Be Confused By A 415 Non-Contiguous Split

Pacific Bell and GTE say they fear that local customers and visitors alike will have great difficulty in understanding and dealing with a non-contiguous split of the 415 area code,

¹¹ See AT&T Statement filed concerning the 415 NPA Exhaust Relief Plan dated April 4, 1996.

¹² D.95-08-052, mimeo at 38.

whereby San Francisco would retain the 415 area code, while Marin County and communities south of San Francisco would obtain a new area code. The Coalition disagrees. Situated upon the tip of a peninsula, San Francisco is one of the most distinct geographic areas in North America. As one of the world's great cities, San Francisco is also readily identifiable as a discrete community of interest. Indeed, any customer who is left "confused" by a non-contiguous split would be downright stupefied by the effects of an overlay, whereby no separate geographical identity would exist.

Pacific Bell also warns that the non-contiguous plan would leave the 415 NPA in between two portions of the new NPA "like the interior of a sandwich between two pieces of bread," and that this would be an "unprecedented situation, not only in California but for the rest of the North American Numbering Plan" ¹³ Contrary to Pacific Bell's assertion, one need only open a copy of the Pacific Bell White Pages to find a veritable delicatessen of area code "sandwiches". For example, the Pacific Bell White Pages "Long-Distance Calling Area Code-Time Zone Map"¹⁴ shows that the 602 Area Code for Phoenix is sandwiched within the 520 area code, Seattle's 206 area code is sandwiched within the 360 area code, Houston's 713 area code is sandwiched within the 409 area code, and that Atlanta's 404 area code is sandwiched within the 706 area code. That a major city can have an area code unique from its neighbors is well established and provides no reason to reject a reasonable and balanced split plan.

¹³ Pacific Bell Comments at 10.

¹⁴ See Pacific Bell White Pages at A25

Fiction #5: Customer Complaints Are More Likely With A Split

A. Claims That Splits Will Generate More Complaints Than Overlays Are Unfounded

Pacific Bell details how a geographic split will generate complaints from those who must change telephone numbers. In contrast, Pacific Bell says, customers do not complain when overlays are proposed.¹⁵ If, as Pacific Bell claims, customers have not complained about overlays, the obvious reason for the silence is more likely due to the fact that no one in California has experienced an overlay. Once customers do experience an overlay and quickly learn that the term “area code” is no longer an “area” code, customers will complain. Moreover, anyone stuck with the less desirable new number will certainly be heard from. This is particularly true of new businesses who must shoulder the special disadvantages of an area code overlay.

Pacific Bell points to its recent experience in the 818 NPA relief plan to show that geographic splits generate complaints.¹⁶ However, the contentiousness of the 818 NPA Relief Plan was, to a great extent, encouraged by Pacific Bell and the industry itself in their public display of division over splits and overlays. The Commission can avoid much of the 818 contentiousness by expeditiously ordering geographic splits of the 415 and 916 areas.

B. An Overlay Does Not Equalize The Life Of Either The Old Or New NPA

Pacific Bell claims an overlay optimizes the life of the Old and new NPA. Pacific Bell also claims that a split is shorter lived than an overlay. The former is pure speculation on

¹⁵ Pacific Bell Comments at 13.

¹⁶ Id.

Pacific Bell's part, as no jurisdiction has had any previous experience with the life of an all service overlay. To the extent an overlay would take a longer time to exhaust, it would likely be due to customer rejection of the undesirable new area code and their attempt to avoid it. Incumbents would therefore retain customers, not by lowering prices or offering better service, but by merely reaping the benefits of their incumbency as a result of their control of numbering resources and their administration of relief

C. Assertions That An Overlay Will Be Less Costly To Customers Are Unfounded

Both incumbents repeat the myth that a split is more costly for customers since they must suffer the "economic burdens of having to change stationery, advertising copy, telephone lists etc."¹⁷ It is true, that under a spit, occupants of the new area code will be subject to this one-time economic burden. However, under an overlay, *all* existing customers, particularly business customers, must *clarify* that they retain the old area code and therefore face the same economic burden. Currently, local businesses generally advertise using only their seven-digit telephone number. In San Francisco, for example, a business will presume that a customer understands that a San Francisco business will have a 415 area code. One can readily observe that business ads, such as those appearing in the Pacific Bell Yellow Pages, on bill-boards, and in other forms of local advertisement, generally contain only a business's seven digit number. This must change under an overlay. A business must modify its stationery, advertising copy and telephone lists to clarify that the business (or individual) retains the 415 area code. In addition, unlike a split, where the customer hardship is temporary, the burden imposed by an overlay will grow along with the use of the new area.

¹⁷ GTE Comments at 7; Pacific Bell Comments at 12.

Scheduling Matters

At the prehearing conference in this proceeding, Administrative Law Judge Kenney requested that parties comment on the need for hearings and the dates for any such hearings. If the Commission decides that an overlay may not be considered at this time for the purposes of implementing relief for the 415 and 916 area codes, then no hearings are necessary. If the stake-holder meeting of June 17 chooses between the two split options in 415, the Commission can proceed to order implementation of relief in both NPAs.¹⁸ If, however, the Commission allows an overlay to be considered at this time, then hearings are essential. As evidenced by the responses set forth in this pleading, there are many disputed questions of fact concerning the virtues of an overlay versus a split method of relief. Moreover, as described in the Coalition's Prehearing Conference Statement dated May 22, 1996, it will be necessary to consider both area specific and generic area code issues. Other factual issues in need of resolution before the Commission could determine the most appropriate relief method include the projected exhaust dates for both area codes and the accuracy and value of the incumbents' customer preference surveys.

If the Commission permits consideration of an overlay at this time, then hearings should be scheduled for the week of August 12 to consider the issues discussed above, as well as the results of the customer surveys of Pacific Bell and GTE. An expedited briefing schedule should then follow, allowing the Commission to issue a final decision by no later than the beginning of October, 1996. In addition, the ALJ should order expedited responses to discovery requests with a discovery cut-off date of July 15, except for discovery concerning the Pacific Bell

¹⁸ The industry has already agreed upon a split option for the 916 area code.

customer surveys. Discovery on matters concerning those customer surveys should continue until the first day of hearings.

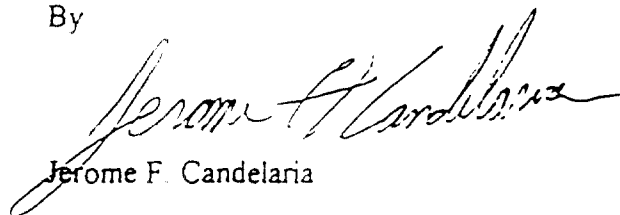
Conclusion

The comments submitted by Pacific Bell and GTE do not justify further consideration of an overlay plan by the Commission for purposes of 415 and 916 area code relief. Accordingly, the Coalition respectfully requests that the Commission order the 415 and 916 area codes to be split as requested by MCI.

Respectfully submitted,

The California Telecommunications Coalition

By

A handwritten signature in cursive script, appearing to read "Jerome F. Candelaria".

Jerome F. Candelaria

Attorney for California Cable Television Association
4341 Piedmont Avenue
Oakland, CA 94611
Telephone: 510.428.2225
Facsimile 510.428.0151

On Behalf of the California Telecommunications
Coalition

June 7, 1996

ATTACHMENT A

Lucent Technologies
Bell Labs Innovations



May 20, 1996

Re: 5/8/96 Information Request for LRN and QoR

Jerry Abercrombie
Task Force Co-Chair
Pacific Bell

Woody Traylor
Task Force Co-Chair
MCImetro

Patricia L. vanMiddelen
Task Force Co-Chair
AT&T

Jerry,
Woody,
Pat,

This letter provides a response for the information requested in your attached letter dated May 8, 1996.

Price Quote, per Switch

Lucent Technologies does not currently sell or price the LRN software on a per switch basis. We have provided our customers with network buyout prices and they are considered proprietary. Our pricing for QoR has been on a network buyout basis and is also considered proprietary. We will continue to provide prices to potential customers under an appropriate non-disclosure agreement.

Software Availability and Generic Release Dates, per Switch Type

We have been participating in industry efforts to define QoR requirements and have offers pending to requesting customers. For your planning purposes, the earliest availability would be 18 months from the time final requirements and business arrangements are completed with interested customers. Consequentially, we can not comment on any specific plans at this time.

Switch Real Time and Memory Impacts

The following information summarizes real time estimates. Given the preliminary nature of these estimates we reserve the right to change them at any time.

Responses 1-4 provides ratios that are for originating switch real time for an originating office perspective. Response 5-7 are donor switch real time ratios. All ratios are for SM real time utilization.


1. For an originating local interoffice call attempt to a ported number with an LNP query at the originating switch, but no QOR, the estimated real time ratio is 1:30:1.
2. For an originating local interoffice call attempt to a non-ported number with an LNP query at the originating switch, but no QOR, the estimated real time is 1:15:1.

3. For an originating local interoffice call attempt to a ported number with a QOR routing attempt and subsequent LNP query, the estimated real time ratio is in the range of 1.7:1. Of this ratio, 40% is estimated to be due to the LNP query and response and 60% is estimated to be due to the QOR specific switch processing.
4. For an originating local interoffice call attempt to a non-ported number with QOR routing and no subsequent LNP query, the estimated ratio is in the range of 1.03:1.
5. For a terminating call attempt to a number that has ported elsewhere with no QOR processing invoked, but with an LNP query from the donor switch, the estimated ratio (relative to benchmark donor real time) is 1.35:1.
6. For a terminating call attempt to a number that has ported elsewhere with QOR processing invoked and therefore no LNP query from the donor switch, the estimated ratio (relative to benchmark donor real time) is 0.40:1.
7. For a terminating call attempt to a non-ported number with QOR processing invoked (the number still resides on the donor switch) the estimated ratio (relative to benchmark donor real time) is in the range of 1.01:1. Note that this assumes there is a QOR trigger set for the associated NPA-NXX which is needed to deal with the line originations and incoming calls which do not have the QOR indicator set.

Patents, Licensing and/or Copyrights

Lucent Technologies holds numerous patents and cannot specify impact at this time.

Please direct any additional questions regarding this matter to me at 708-224-6160.



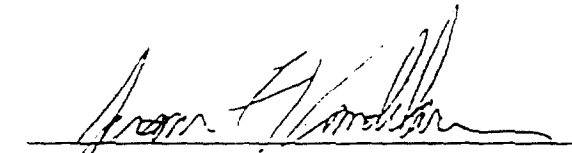
Al Loots
Lucent Technologies

VERIFICATION

I, Jerome Candelaria, Attorney for the California Cable Television Association, hereby verify that the statements in the forgoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.


Executed on June 1, 1996 at Oakland, California.



Jerome Candelaria
Attorney
California Cable Television Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 7th DAY OF JUNE 1996 SERVED THE FOREGOING DOCUMENT UPON ALL KNOWN PARTIES OF RECORD IN THIS PROCEEDING BY SENDING A COPY THEREOF TO EACH SUCH PARTY BY FIRST-CLASS MAIL.


LA TANYA LINZIE

Service List

R.95-04-043

I.95-04-044

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